

Eastleigh Borough Local Plan 2011-36 – Draft Housing Trajectory

1. Introduction & Summary

1. The Eastleigh Borough Local Plan 2011-36 is seeking to make provision for 16,250 dwellings in the period 2011 to 2016. This equates to a target of 650 dwellings per year derived largely from the informal and non-statutory sub-regional strategy prepared by PUSH (the Partnership for Urban South Hampshire) in the form of the Spatial Position Statement published in June 2016.
2. This paper is a draft housing trajectory which sets out how the borough council expects that housing requirement will be met. It describes the various different sources of supply and explains the rationale and assumptions which underpin the dwelling numbers attributed to the various components of supply and how and why the dwellings have been phased the way they have over the plan period.
3. The bulk of the raw data has been provided by Hampshire County Council (HCC) from its Land Availability Monitoring System (LAMS). LAMS is based on a comprehensive process of monitoring new planning permissions, starts and completions on sites based on information provided by district councils in Hampshire and supplemented by an annual round of site visits. LAMS is widely regarded as a comprehensive, robust and detailed assessment of housing land supply in the county and its outputs are regularly scrutinised through local plan examinations and s78 appeals.
4. The trajectory has a base date of 1st April 2016 as that is the latest date for which published data is available. The Council expects to be able to update the trajectory to a 1st April 2017 base date in October 2017 once Hampshire County Council makes its LAMS updates available. However, the trajectory records progress on developments which have been permitted since the base date in order to ensure it is as accurate and up to date as possible. This is not least because the borough council has granted or resolved to grant planning permission for a large number of dwellings over and above that which was committed at the base date. It has also lost a number of planning appeals in that period which will also feed into the housing land supply over the course of the plan period.
5. The components of supply are as follows:
 - a. Total net Completions 1st April 2011 to 31st March 2016
 - b. Planning permissions on large sites (10 or more dwellings net gain) at 1st April 2016
 - c. Resolutions to grant planning permission (or sites lost at appeal) issued since 1st April 2016
 - d. Former local plan allocations from the draft 2011-29 version of the local plan

- e. An allowance for completions on small sites (9 or fewer dwellings net) based on past rates for the period 1st April 2016 to 31st March 2036
 - f. An allowance for completions on large windfall sites (10 or more dwellings net) based on past rates for the period 1st April 2026 to 31st March 2036
 - g. An estimate of the anticipated rate of housing delivery from the North of Bishopstoke and North and East of Fair Oak Strategic Growth Option (SGO) to be allocated for development in the local plan
 - h. An estimate of delivery from other sites to be allocated in the local plan
6. This draft trajectory does not cover point g. above in any detail. Delivery of the SGO is discussed in a separate paper.
7. A summary of the draft trajectory is set out below. This replicates Table 1 in the Appendices to this paper:

Requirement:

Housing Requirement 1.4.2011 to 31.3.2036	16,250
Completions 1.4.2011 to 31.3.2016	1,674
Residual Requirement 1.4.2016 to 31.3.2036	14,576

Supply:

Discounted (5%) Large Site Commitment at 1.4.2016	4,880
Discounted (10%) Resolutions post 1.4.2016	2,686
Discounted (20%) former Plan Allocations	1,207
Discounted (20%) Small Site Allowance at 50pa 1.4.2016 to 31.3.2036	1,000
Discounted (20%) Windfall Allowance at 86pa 1.4.2026 to 31.3.2036	860
SGO Delivery Within Plan Period	3,350
Total Discounted Supply	13,983

Shortfall (Requirement minus Supply): **-593**

To be Allocated (Shortfall Plus 10%) **-652**

Allocated in the emerging draft local plan 696

Surplus +44

8. All figures quoted are net figures and so take account of losses to the dwellings stock as a result of conversions, demolitions and changes of use. Each of the components of supply, aside from completions in the first five years of the plan period which reflect actual development which has been implemented, is discounted to some degree varying between 5% and 20% of the total for the respective component of supply or compared to past rates of delivery. If no discounts were applied to any of the identified-site components of supply the trajectory would show a surplus of 264

dwellings meaning there would be no need (in purely numerical terms) for the local plan to allocate any additional land for residential development in order to meet the local plan target. If the large and small site windfall allowances also went undiscounted the trajectory would be over 700 dwellings in surplus. If all components of supply went undiscounted and a large site windfall allowance was counted for the full 20 remaining years of the plan period (rather than the ten year period included in the trajectory), the trajectory would be over 1,700 dwellings in surplus.

9. In that regard, this makes the trajectory a cautious trajectory and very much a worst-case scenario in terms of the residual figure to be addressed through new allocations in the local plan. The borough council has adopted this cautious approach in order to ensure that this 2011-36 version of the local plan does not suffer the same fate as befell the draft 2011-29 version which was found unsound by the local plan examination Inspector largely (but not exclusively) on the grounds of housing land supply.
10. That said, it is clear from completions achieved in the first five years of the plan period (2011 to 2016) that future delivery of housing will have to occur at a level which is consistently double that achieved during those first five years. Against a local plan target of 650 dwellings per year only 335 per year were achieved on average in the first five years meaning that delivery must average 729 dwellings (again, on average) each year of the remainder of the plan period if the 16,250 dwellings target is to be met. By adopting a cautious approach to delivery of most sources of supply compared to past rates the borough council is aiming to ensure that there is a sufficient supply of new sites allocated and available for development to ensure this completion rate is achieved and maintained.
11. Table 2a in the Appendices describes the trajectory by individual component of supply and by year. This year by year trajectory is of the undiscounted supply.
12. Table 2b is a discounted version of Table 2a. The discount takes the numerical value of the 5%, 10% and 20% discounts for the commitment, former plan allocations and resolutions components of supply respectively and applies these on a pro rata basis for each of the years those component of supply are anticipated to contribute to overall supply. In other words, a 10% discount to the resolutions component of supply equates to 298 dwellings. Resolutions are expected to contribute to supply for 12 years of the trajectory period from 2017/18 to 2028/29. $298 \div 12 = 24.83$ (rounded to 25) so each year is discounted by 25 dwellings.
13. It is interesting to note from this year-by-year summary trajectory that it shows a reasonable continuity of supply throughout the plan period. While there is a degree of front-end loading this reflects the extent to which the council has granted or resolved to grant planning permission for new housing development in recent years (largely on the back of the stalled draft 2011-29 local plan). These sites which currently benefit from planning permission will come forward in the early years along with a continuous supply of small sites throughout the whole plan period. As

these begin to dwindle the sites which are currently going through the process of securing permission and are in receipt of a council resolution to permit will come on stream. This will be most likely followed by the former local plan allocations on which active discussions are currently taking place with landowners, developers and site promoters and then the new sites allocated in this local plan. Eight years into the plan period (from 2016 i.e. by 2024/25) it is anticipated that the North of Bishopstoke and North East of Fair Oak Strategic Growth Option (SGO) will come on stream and continue to deliver well beyond the plan period. And in year ten it is assumed that unidentified large windfalls will begin to come forward. So, taken as a whole, the trajectory demonstrates that there will be a continuity of supply throughout the plan period and that there will be a variety of size, type and location of sites coming forward to provide choice and flexibility in the market.

14. The remaining sections of this paper go on to explain the individual components of the land supply requirement and trajectory in more detail and set out the sources of the data, the assumptions applied and the justification given for the approach to estimating each individual component of the calculation including the justification and rationale for the various discounts applied.

The Housing Requirement

15. The housing requirement for the local plan is derived from the PUSH Position Statement to 2034 prepared by the Partnership for Urban South Hampshire (PUSH) and published on the [PUSH website](#) on 7th June 2016. Policy H1 of the Position Statement allocates Eastleigh borough a figure of 14,950 dwellings for the period 2011-34. This equates to an annual requirement on 650 dwellings per year. It is acknowledged that the Position Statement is a non-statutory document. However, it is an important material consideration in the preparation of the local plan as it represents an agreed figure between the south Hampshire authorities and so is a manifestation of the duty to co-operate being successfully delivered by those south Hampshire authorities. The Position Statement also makes it clear that, while the housing targets in Policy H1 are to be treated as minima, they are not hard-and-fast requirements:

“Housing targets set out in Table H1 are intended to inform the review of local plans to meet longer-term development needs, particularly beyond 2026. a district’s housing requirement must be established through a more detailed (localised) consideration of environmental constraints, infrastructure requirements and the need for complementary land uses. “
(para 5.33)

16. The housing figures in Policy H1 of the Position Statement were derived from work done by the consultancy GL Hearn to inform the preparation of the Position Statement; namely a [Strategic Housing Market Assessment](#) (SHMA) for South

Hampshire dated January 2014 supplemented by an [Objectively Assessed Housing Need \(OAHN\) Update dated March 2016](#).

17. The OAHN update identifies an OAHN for Eastleigh borough of 580 dwellings per year (see Table 62 on page 115).
18. Since the production of the PUSH Position Statement the borough council resolved, at a meeting of its Cabinet on the 14th July 2016, to use a new interim target for the purposes of monitoring 5 year land supply of 630 dwellings per year. This figure arose after consideration of the then current assessment of five year land supply, produced for the borough council by GL Hearn as considered by a Planning Inspector who considered a s78 appeal in respect of land at Bubb Lane, West End dated 24th May 2016. The Inspector determined that, “for the time being” on the basis of the evidence available to him, the OAHN figure for Eastleigh borough should be 630 dwellings per annum (see para 42 of Appeal Decision APP/W1715/W/15/3063753). This figure of 630 has been used as the basis for calculating 5-year supply in subsequent appeals.
19. While a new OAHN figure of 630 dwellings per year reduces the contribution made by Eastleigh borough to the wider Southampton housing market area shortfall, it is still less than 650 dwellings per year meaning that the local plan still comfortably exceeds its OAHN figure. It will not be possible for the borough council to further address any shortfall in the wider Southampton housing market area as the OAHN for the wider market area has not been calculated. This will be a matter for the PUSH authorities to consider through an update of the sub-regional SHMA and a review of the spatial strategy and the distribution of housing across the PUSH area.

a). Past Completions

20. Table 3 of the Appendices summarises the total net completions achieved in the first five years of the plan period (from 1st April 2011 to 31st March 2016). It is derived from data kindly supplied by Hampshire County Council from its LAMS. The figures are net figures meaning that they take into account losses to the dwelling stock which often come about as part and parcel of planning applications for housing development through the demolition of existing dwellings, the conversion of a dwelling into separate units or flats or the change of use of dwellings to other uses.
21. The County Council, in its monitoring of housing land supply, distinguishes between large and small sites. Large sites are those accommodating a net gain of 10 or more dwellings. Small sites are those accommodating a net gain of 9 or fewer dwellings. So, a site proposed for 12 dwellings which involved the demolition of 2 existing properties would be classed as a large site with a net gain of 10 dwellings. A site of

12 dwellings which involved the loss of 3 existing dwellings would be classed as a small site with a net gain of 9 dwellings. All of the monitoring undertaken in HCC's LAMS follows the same protocol ensuring that there is no double count or overlap between the different components of supply whether this be allocations and permissions or the allowances made for small site and large site windfall development based on past completion rates.

22. Table 3 shows that completions totalled 1,674 dwellings in the first five years of the plan period; an average of 335 dwellings per year. There was not a single year in the five year period when the annualised local plan housing target of 650 dwellings per year was met. The highest annual level of completions was achieved in the most recent year (2015-16) when 458 were achieved.
23. Initial indications from informal discussions with HCC data are that completions in 2016-17 will be higher still with provisional figures suggesting a net completion rate for 2016-17 of 515 dwellings and starts of 834 dwellings. This would be the highest annual net completion rate achieved in the borough since 2008/9 albeit it is lower than the rate assumed in the trajectory for 2016/17.
24. That said, the level of completions which need to be achieved going forward is not unachievable if longer term past delivery rates are considered (pre-dating the plan period). Looking at Table 4 in the Appendices the average annual net completion rate achieved in the 20 year period 1991 to 2011 was 483 dwellings per year. Completion rates in individual years reached 730 dwellings in 1993/94, 742 in 2006/07 and 906 in 2004/05.
25. There is data available from HCC which shows that annual rates of well over 1,000 dwellings were achieved during the 1970's and 80's on large sites alone. However, as this is very historic data it cannot be guaranteed to be directly comparable with post-1990 data so is to be treated with a degree of caution.
26. Returning to the 2011-2016 period, it is interesting to note that, in a time when 1,674 completions were achieved, the council actually granted planning permission for 5,700 dwellings (see Table 5 in the Appendices). Clearly there is a lag time between permissions being granted and development commencing. However, it illustrates that the availability of housing permissions is only one element of the housing delivery equation. There needs to be effective market demand and a willingness of the development industry to get on and build sites for houses to be built. It is not simply a function of the availability of planning permissions.

27. Tables 6 and 7 in the Appendices to this paper provide more detail of the completions achieved in the first five years of the plan period. In the case of the large site completions these are listed by site and by year in Table 6. Table 7 provides a summary of small site completions by year albeit that Table 11 provides the data by site and year going back to 2001. Table 7 also includes data on completions on garden land which is relevant to the matter of small site allowances which are considered in section e) of this paper.

b). Commitment

26. The commitment table (Table 8 in the Appendices) lists all the large sites (10 or more dwellings) which benefit from a current valid planning permission at 1st April 2016 and sets out their expected delivery trajectory by year until they are complete. It includes sites with both outline and full/reserved matters permission and sites granted on appeal by a planning inspector or the Secretary of State. The numbers included in the table are net and so take into account any losses associated with the proposed development. This data is also sourced from the HCC LAMS albeit that it is updated with a commentary on the current state of play on each site, sourced from the borough council's five year supply report which is updated quarterly by GL Hearn consultancy.

27. In addition to the commitment at 1st April three relatively small 'large' sites have been granted permission post-1st April 2016 which do not feature elsewhere in the trajectory. These sites are highlighted red in Table 8 of the Appendices and total 35 dwellings across the three sites. They are included in the trajectory in order to present an up to date picture of supply.

28. As a five year supply study, the GL Hearn paper only phases the delivery of sites up to 31st March 2021 (five years from the 1st April 2016 base date). For the purposes of this trajectory, which covers the longer plan period, it is assumed that, where sites are expected to be built over longer than the five year period, delivery will continue at the same rate beyond the five year period until they are complete. Given that the phasing within the five years is updated by GL Hearn based on contact with the developers and promoters of the sites in the commitment list this is considered to be a reasonable and robust approach albeit that, the larger the site and the longer the period over which it is built, the larger the degree of uncertainty there is over the accuracy of the estimate.

29. Table 8 highlights how much development has been permitted in the borough in recent years in that, at 1st April 2016 there was a stock of permitted dwellings totalling 5,102 dwellings which is approaching one-third of total supply (31.3%). Adding in the three sites referred to in paragraph 27 above gives a total commitment of 5,137 dwellings.

30. Taken together, if completions (discussed above) are added to the stock of planning permissions they total 41.6% of supply during the plan period which is considered to be a fairly robust starting point for housing delivery going forward.
30. Even though there is a large stock of committed dwellings it is occasionally the case that some planning permissions are never taken forward and implemented on the ground. This can be for a number of reasons including a change in ownership or owners changing their minds or because the application for development was never a serious development proposition in the first place and was only submitted for valuation or other reasons. Whatever the reason, it is standard practice to make an allowance for this uncertainty. If it is known that a site will definitely not be implemented then it would not be counted as a genuine commitment on the basis that the National Planning Policy Framework (NPPF) requires authorities to be identifying the supply of developable and deliverable sites (see para 47 and footnotes 11 & 12 of the NPPF) and such sites would not be considered developable or deliverable.
31. Because this is an allowance for uncertainty it is not possible to simply discount certain sites. Rather it is usual to apply a percentage discount to the total commitment figure. A 10% discount is widely used though some authorities use a smaller percentage if they have a greater degree of confidence (based on robust evidence) that more of their commitments will definitely be implemented. Authorities rarely use greater than 10% as that is tantamount to an acknowledgement that there are probably some sites included in the commitment which should not be counted at the outset.
32. However, it should be noted that the borough council publication “Five Year Housing Land Supply Position: Housing Implementation Strategy for the Borough of Eastleigh” dated 30th June 2015 states, at paragraph 4.2.5 that:

“4.2.5 In order to provide a robust estimate of how many of the dwellings that are the subject of outstanding planning permissions are likely to be delivered, an analysis of lapse rates has been undertaken. This compared the net number of previously permitted dwellings where permission was allowed to expire against the total number of dwellings with outstanding planning permission. This analysis looked at the annual rate of lapses each year between 2001 and 2014. The findings indicate that outstanding permissions should be discounted by 1% to allow for lapses.”.

https://www.eastleigh.gov.uk/media/138172/ppi_150828HISJune-2015FINAL.pdf

33. On this basis, and given the circumstances as they pertain to Eastleigh borough, it is considered that a 10% discount of the commitment would be overly cautious would excessively reduce the estimate of potential supply meaning more greenfield sites may need to be allocated than are necessary to meet the housing requirement. Looking at the individual sites which comprise the commitment in Table 8 of the Appendices, the vast majority of sites are already under-construction meaning they will deliver their anticipated dwelling supply. Of the 36 committed sites, 15 were under construction as at the 1st April 2016 base date. A further 12 are known to have started on site by early 2017 leaving only 9 sites on which work has not yet started. Of these, only 3 are phased beyond year three of the trajectory. Two are small sites totalling 12 and 10 dwellings (sites 0329 and 0336 in the trajectory respectively). The largest is the Draper Tools site in Chandlers Ford (site 0309) for 140 dwellings where there are personal circumstances which will affect when that site can be delivered. Even then, however, the owners have recently submitted a reserved matters application for the site on the same basis as the original outline and are confident the site will be delivered well within the plan period.
34. In spite of this large degree of certainty about the majority of supply it is considered that a 1% discount is probably unduly cautious. While it is acknowledged that it is an arbitrary figure, this trajectory applies a 5% discount to the large site commitment to allow for non-implementation. A 5% discount equates to 257 dwellings which is far more than the total of the 3 sites identified above. So 5% is still considered to be a generous discount given the circumstances surrounding the sites which make up the total commitment. However, the borough council wishes to ensure that the overall assessment is robust and that the local plan's approach to housing supply is reasonable and realistic.

c). Resolutions

35. Resolutions refer to those planning applications which have been taken to the relevant local area planning committee and received a resolution to grant planning permission subject to certain outstanding matters being addressed before the permission is issued. The authority to resolve those matters is usually delegated to officers and the formal decision notice can be issued once officers are happy the matters have been resolved. This normally involves the need to negotiate s106 agreements for the provision of infrastructure or services associated with the proposed development or a requirement for the developer to provide further information and assurances to the borough council that certain matters can be adequately addressed.
36. A resolution does not have the same degree of weight or status as a formal commitment as a development could not be implemented on the back of a committee resolution. For this reason resolutions are treated separately to formal

commitments in this trajectory. It is also the reason why a greater discount is applied to the resolutions category than the formal commitment as there may be reasons why some sites are not taken forward. More usually it is a case that there may be a long delay while these negotiations take place rather than a site not be implemented at all. However, a resolution is still a formal decision of the borough council that permission will be granted provided those outstanding matters can be overcome and so it is reasonable for this element of supply to be included in the housing trajectory.

37. In terms of the discount, as with the commitment figure above, it should be noted that the document "Five Year Housing Land Supply Position: Housing Implementation Strategy for the Borough of Eastleigh" dated 30th June 2015 states, at paragraph 4.2.6 that:

"4.2.6 These sites are the subject of committee resolutions to grant planning permission but are awaiting the completion of legal agreements. They are also included in the schedule in appendix 2. As with outstanding permissions this total has been discounted by 1% to allow for lapses."

38. As with the commitment figure, it is considered that applying only a 1% lapse discount does not fully reflect the degree of uncertainty and does not provide sufficient flexibility in the supply of land for housing. Given that a resolution to grant planning permission is of a lesser status than the formal issuing of a decision notice it is reasonable to assume that, in principle, there is somewhat less of a guarantee that a site with a resolution will be implemented than one with the benefit of an actual planning permission. This is the approach adopted in this trajectory though it is acknowledged that there is a degree of subjectivity as to what level of discount it is reasonable to apply. If it is reasonable to discount the commitment by 5% then it is proposed that the resolutions figure should be discounted by 10% to reflect the fact that some resolutions may fall by the wayside and lapse and some may never be implemented. Given that there is a stock of resolutions at and post-1st April 2016 totalling 2,984 dwellings a 10% discount equates to 298 dwellings (see Table 9 of the Appendices) leaving a net resolutions figure of 2,686.

d). Former Local Plan Allocations

39. The draft 2011-29 local plan, which was found unsound by the local plan examination Inspector, was never formally withdrawn by the borough council. This was a deliberate decision by the borough council as it wished to provide a context, albeit a non-statutory one, to guide future housing development in the borough. This has proven particularly prescient as the vast majority of sites allocated in that draft local plan now feature in the commitment or resolutions component of this housing trajectory.

40. The draft 2011-29 local plan made housing allocations for a total of 6,811 – 6,841 dwellings (two sites expressed a capacity by way of ranges totalling 30 dwellings between them). Of those dwellings there is no concrete progress in respect of only 293 dwellings. These 293 comprise only approximately only 4% of the total amount of new housing provision made in that local plan. This means there is development progress on 96% of the new housing provision identified in that draft plan. These dwellings are either complete, are under construction, have been granted planning permission or are in receipt of a council resolution to permit subject to various conditions and agreements.
41. To delve a little further, 3,096 of the 6,706 dwellings are either complete (admittedly only 221) or are under-construction (2,875). A further 2,373 have either been permitted or are in receipt of a resolution to permit leaving only 1,263 which are only at the planning application or pre-application stage. This demonstrates real progress and a significant commitment on the borough council's part to ensuring future housing delivery. This is also evident in the fact that the number of dwellings subsequently permitted on these sites totalled 6,951 compared to the allocation of 6,811-6,841 suggesting that the council's initial local plan estimate of the dwelling capacity of allocated sites was fairly accurate and by no means over-optimistic.
42. The current assessment of the capacity of the residual local plan allocations which are not counted elsewhere in the trajectory is 1,509 dwellings as identified in Table 10 of the Appendices to this trajectory . The bulk of this component of supply is made up of two sites owned by Hampshire County Council totalling 1,100 dwellings; Uplands Farm, Winchester Street, Botley (300) and West of Woodhouse Lane, Hedge End (800). The County Council is working to deliver a new secondary school in the Hedge End area in the next 2-3 years and has commenced pre-applications discussions with the borough council with a view to submitting a planning application for the development of the Woodhouse Lane site within the next two years.
43. Both the Woodhouse Lane and Uplands Farm sites are tied to the provision of the Botley Bypass; a long-standing policy aspiration to relieve traffic congestion at the crossroads in the village centre. The bypass would run through both of the HCC sites to varying degrees. Earlier in 2017 the County Council undertook an EIA scoping consultation for the new road demonstrating that significant progress is being made on the implementation of these two large development sites. The County Council is anticipating submitting a planning application for the Botley Bypass in summer 2017.
44. It is fair to acknowledge that there is considerably more uncertainty over the other sites in this component of supply. CF1 (The Precinct, Chandlers Ford) is a long-standing policy aspiration which dates back to plans prepared in the 1980s and 1990s. CF2 (Common Road Industrial Estate, Chandlers Ford) is more certain and is

tied in to the development of the Draper site referred to above as it is largely in the same ownership. E4 (Land at Toynbee Road, Eastleigh) has been mainly developed with only a site currently in use as a builders merchants and various vehicle sales and rental uses still to be developed. FO2 (Land North of Mortimers Lane, Fair Oak) has previously been subject to a planning application for a larger site which was withdrawn but there is still current developer interest in this site. FO3 (Land at Scotland Close, Fair Oak) may not be developable in its entirety due to serious contamination concerns though a smaller part of the site is thought to be developable. HE3 (Shamblehurst Household Waste Recycling Centre, Hedge End) was anticipated to become available for housing development once the County Council relocated the existing Household Waste Recycling Centre (HWRC). However, subsequent reviews of HWRC provision by HCC mean this is now unlikely such that this site will not be redeveloped. In the long term, however, this site is within the urban edge and surrounded by residential development so the borough council's aspiration to seek the HWRC's relocation remains. But, at present, it is considered that this site may not come forward for housing.

45. Site HE2 (Foord Road / Dodwell Lane) is owned by the borough council and is tied in to the development of an adjoining site currently being implemented by Foreman Homes. It is expected that this site will be developed within the next 5 years.
46. Finally, in West End, site WE4 (Coach Depot, Moorgreen Road, West End) is another long-standing allocation. The existing use is not entirely compatible with its largely residential location. It would only come forward for housing if a suitable alternative site was found for the current occupiers. Site WE12 is currently subject to a pre-application enquiry.
47. Of the 1,509 dwellings, therefore, there is only doubt about the delivery of 293 dwellings on 5 sites (CF1 – 85 dwellings, the residue of E4 – 64 dwellings, FO3 – 54 dwellings, HE3 – 10 dwellings and WE4 – 80 dwellings). Rather than fully exclude these 293 dwellings (because it remains a long-term policy aspiration of the borough council to seek redevelopment of these sites) it is proposed to discount the allocations figure by 20% which equates to 302 dwellings which is marginally greater than the capacity of these uncertain sites. On that basis it is considered a reasonable and robust approach.

e). Small Site Allowance

48. Paragraph 48 of the NPPF states that:

“Local planning authorities may make an allowance for windfall sites in the five-year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a

reliable source of supply. Any allowance should be realistic having regard to the Strategic Housing Land Availability Assessment, historic windfall delivery rates and expected future trends, and should not include residential gardens.”

49. If it is reasonable to make an allowance for windfall sites based on compelling evidence for the five year supply calculation it must logically be reasonable to make an allowance for the plan period if there is compelling evidence of past delivery.
50. As noted in previous sections of this trajectory report, the County Council’s LAMS is a comprehensive database of past and future housing land supply. HCC has provided information on net small site completion rates in Eastleigh borough going back to the year 2001. This data is summarised in Table 11 of the Appendices to this report. It shows that small sites (of 9 or fewer dwellings net gain) have made a fairly constant and continuous contribution to the delivery of housing in Eastleigh borough. As small sites they were never allocated in local plans and so have come forward outwith the local planning process. The current local plan will only allocate sites which are capable of accommodating 10 or more dwellings net meaning that, if no allowance was made in the trajectory, it would significantly under-estimate the likely level of housing delivery over the plan period.
51. The data in Table 11 of the Appendices show that 1,127 dwellings (net of losses) were delivered in the 15 year period 1st April 2001 to 31st March 2016. This equates to a net gain of 75 dwellings per year on average.
52. In 2012 the NPPF introduced the requirement that garden land should be excluded from windfall allowance calculations. HCC’s LAMS did not previously record whether or not a development was on garden land until the NPPF introduced this requirement (it actually started monitoring this when the draft NPPF was published in 2011). For that reason there is only data on completions on garden land from 2011 onwards. Given the large number of small sites in LAMS (see the hundreds of sites listed in Table 11 of the Appendices for Eastleigh borough alone) the County Council has, understandably, never sought to retrofit the NPPF’s garden-land requirement to historic completions data going back to 2001.
53. What monitoring of completions on garden land has taken place since 2011 shows that a total of 66 net completions were thought to have been delivered on garden land. This equates to a figure of 13 dwellings per year on average. If this 13 dwellings per year average is deducted from the average total net small site completion rate of 75 dwellings per year, this leaves 62 dwellings per year which can reasonably be assumed to comply with the NPPF requirements based on the best evidence available.

54. The borough council is confident in this data and in the principle that small site development will continue to come forward in the borough. If anything, with the current Government policy emphasis on housing delivery, it might be reasonable to assume windfall development will come forward at a higher rate in the future than in the past. However, this would be speculation and the trajectory must be based on robust evidence. On that basis, and to err on the side of caution in view of the previous local plan Inspector's assessment of land supply in the draft 2011-29 local plan, the borough council proposes to apply a considerable discount to the past rates figure of 62 dwellings per year.

55. There can be no science behind this as uncertainty is, by definition, uncertain. A 10% discount would equate to an allowance of 56 dwellings per year. However, the borough council is proposing to apply a 20% discount resulting in a small site windfall allowance of 50 dwellings per year or a total of 1,000 dwellings over the remaining 20 years of the plan period. This equates to only 6% of the total local plan requirement of 16,250 dwellings and so is considered a realistic, reasonable and justified approach. Not least since, at the base date of 1st April 2016 there were extant planning permissions for a total of 214 net dwelling completions (252 gross dwellings minus 38 losses) on small sites in the borough (see Table 12 in the Appendices to this trajectory). This means that over 4 years worth of supply is already in place.

f). Windfall Allowance

56. The NPPF defines windfall sites in its Glossary (Annex 2) as follows:

***“Windfall sites:** Sites which have not been specifically identified as available in the Local Plan process. They normally comprise previously-developed sites that have unexpectedly become available.”*

57. As noted above, paragraph 48 of the NPPF allows local authorities to:

“.....make an allowance for windfall sites in the five-year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply.”

58. There is no restriction placed in the NPPF on the size of site which can be classed as a windfall. The defining characteristic of a windfall site is that it is a site which has not been allocated or identified through the local plan process. The HCC LAMS identifies sites which were allocated through local plans as well as those which arise outwith the local plan process. This makes it possible to investigate the extent to which large windfall sites (as opposed to small sites of 9 or fewer dwellings dealt with above) have contributed to land supply in the past.

59. Data has been provided by HCC from LAMS covering large windfall sites which have delivered completions in the period 1st April 2010 to 31st March 2016. The relevant extract from LAMS is summarised in Table 13 of the Appendices to this paper. It is worth stressing that Table 13 deals with net completions; not simply sites which have been granted planning permission.
60. It may be argued by some that there would have been an unusually high level of large windfall development in recent years in Eastleigh given that the local plan was found unsound and because of the introduction of the 5-year supply requirement in the NPPF in 2012. However, the borough council would argue that this is not the case for a number of reasons.
61. Firstly, looking at the data in Table 13 there is no discernible trend in large net windfall completions which would point to a NPPF/5-year supply effect. Secondly, even though the draft 2011-29 local plan was found unsound, it was not formally withdrawn and, as noted above, the vast majority of the sites allocated in that local plan have, in any event, come forward for development. The sites listed in Table 13 do not include any site allocated in the non-statutory draft 2011-29 local plan. Thirdly, if there was an NPPF/5-year supply effect there is no reason to think that that effect will not continue for the remainder of the plan period. Finally, and in any event, the borough council is proposing a significant discounting of the past windfall rate as discussed below.
62. The borough council is comfortable, therefore, that the NPPF permits a large site windfall allowance being included in the housing trajectory and that there is compelling evidence that such development has made an important contribution to land supply in the borough in the past.
63. The data in Table 13 shows that there were a total of 1,047 gross completions on large windfall sites in the borough in the 6 year period 1st April 2010 to 31st March 2016. Taking into account losses of 396 dwellings gives a net yield of 651 dwellings which equates to an annual average of 108 dwellings per year.
64. The NPPF requires that local planning authorities submit to Government what they consider to be a "sound" local plan. One of the requirements of a sound local plan, as clarified in the National Planning Practice Guidance (NPPG) is that the plan is able to demonstrate a 5-year supply of housing land which accords with the definitions given at paragraph 47 of the NPPF and at footnotes 11 & 12.
65. If it is assumed that the current local plan is able to demonstrate a 5-year supply of housing land (and this is covered in a separate background paper) it is logical to assume that the potential for windfall sites to come forward in the first five years of the plan period (in this case, the residual plan period 2016-2026) is limited. In

demonstrating it has a 5-year supply of housing land the borough council and the local plan should have identified those sites which will contribute to housing delivery in that five year period. For that reason, the borough council is not proposing to include a large site windfall allowance for this first five years of the plan period (2016-2021).

66. Indeed, in order to err on the side of caution, the borough council does not propose to include a large site windfall allowance for the period for the second five year period (2021-2026). Rather, it is only proposed to include an allowance for 10 of the 20 years remaining of the plan period (2026-2036).

67. In addition, instead of allowing for 10 years of development at the average past net completion rate of 108 dwellings per year, it is proposed to discount this by 20% (admittedly an arbitrary figure) to reflect future uncertainties and unknowns. This results in annual average figure of 86 dwellings per year and in an overall allowance of 860 dwellings over the remaining 20 years of the plan period.

68. So, instead of the full past rates average of 108 per year being counted for the full 20 years of the remaining plan period and resulting in a total allowance of 2,160 dwellings, an allowance of 860 is being made instead. It is clear from the Strategic Land Availability Assessment (SLAA) that there are plenty of sites which have been put forward by developers, land owners and site promoters as candidates for residential development, which are not accounted for elsewhere in this trajectory in one form or another, which might be capable of delivering 860 dwellings many times over by 2036. The windfall allowance of 860 dwellings, therefore, is considered to be justified, realistic and fair.

g). Strategic Growth Option

69. A key feature of the local plan is the proposal for a Strategic Growth Option (SGO). The emerging preferred option for that SGO is on land north of Bishopstoke and north and east of Fair Oak. This SGO is thought capable of accommodating approximately 5,200 dwellings. However, given the lead-in times for such large scale development and the need for the upfront provision of significant elements of new infrastructure (mainly a new link road), there is very little likelihood of anything like the full 5,200 dwellings being completed within the plan period.

70. The borough council has produced a separate background paper which discusses the factors which might influence the delivery of the SGO. That paper concludes that, weighing all the factors in the balance, a figure of 3,350 is a reasonable estimate of the SGO's contribution to the overall supply of housing land within the plan period.

h). New Allocations

71. Taking all of the above components of housing land supply and all of the above factors into account it is considered that there remains a shortfall against the local plan housing target of 16,250 dwellings of 593 dwellings (see Table 1 of the Appendices). This is the number of dwellings which needs to be addressed in the form of new allocations in the plan. Once these are identified they will be addressed in more detail in subsequent versions of this trajectory. For now, however, that is almost the final stage in the trajectory process. One matter remains, however. That is the need to factor in the possibility that some of the sites which might be allocated might not, despite the borough council's best intentions and based on the best information available at the time the plan is submitted, actually be delivered. This scenario could well arise if the experience of the draft 2011-29 local plan is anything to go by. It can be seen from section d) of this paper that not every allocated site was delivered as anticipated. While the Council has full confidence that the majority of the previous allocations will be delivered in the next 20 years, there might be some sites which simply do not come forward.
72. If 293 dwellings allocated in the draft 2011-29 plan never come forward (sites CF1, the residue of E4, FO3, HE3 and WE4 in Table 8 of the Appendices to this paper) never come forward this would equate to 4% of the dwellings allocated on sites in that draft 2011-29 plan.
73. In order to allow for the possibility that some of the newly allocated sites in this plan might not come forward, and in order to err on the side of caution and continue with the theme of building in flexibility to the trajectory in this plan, it is proposed to add not 4% but 10% to the 593 shortfall identified above meaning that the plan will allocate sites capable of accommodating at least 652 dwellings. Again, it is acknowledged that 10% is an arbitrary figure. But is considered a fair and reasonable allowance in the circumstances and is in accordance with the principle of caution which underpins this trajectory and demonstrates that the borough council is not seeking to shirk any of its responsibility to enable the provision of much needed housing in the borough.
74. As a result of preparing the above trajectory and identifying a deficit to be met through new allocations in the local plan the borough council has been through a process of identifying the best performing (or least worst) new greenfield sites (and a number of brownfield sites) which are to be allocated in the emerging draft local plan. These are provisional allocations at this stage pending the finalisation of key aspects of the evidence base. The detailed methodology used to select these sites is set out in a separate paper. However, the sites are listed in Tables 14 and 15 in the Appendices to this paper. Table 14 lists the new greenfield allocations and Table 15

the sites lying within the urban edge identified in the SLAA which are proposed to be allocated in the local plan.

75. Given a need to allocate sites for 652 dwellings the new greenfield allocations listed in Table 14 total 611 dwellings. In addition Table 15 identifies a number of brownfield sites within the defined urban edge which are to be allocated for a total of 85 dwellings making a total of 696 dwellings.

76. This total exceeds the residual requirement by 44 dwellings or 6.75%

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